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United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
BRENDA VILLA,  
  
Defendant.

CASE NO. 2:22-CR-245 WBS

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status hearing on February 27, 2023, at 9:00 a.m. The parties appeared on calendar for that status hearing. During the hearing, the Court ordered that the parties submit a written order regarding the excludable time sought.

2. By this stipulation, the defendant now moves to continue the status conference until April 10, 2023 at 9:00 a.m., and to exclude time between February 27, 2023, and April 10, 2023, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes over 10,000 pages, including investigative reports, business records, medical records

1 and other materials, in addition to audio files. All of this discovery has been either produced  
2 directly to counsel and/or made available for inspection and copying.

3 b) Counsel for defendant desires additional time to review the current charges, to  
4 conduct investigation and research related to the charges, and to review the current charges and  
5 discovery with the defendant.

6 c) Counsel for defendant believes that failure to grant the above-requested  
7 continuance would deny him the reasonable time necessary for effective preparation, taking into  
8 account the exercise of due diligence.

9 d) The government does not object to the continuance.

10 e) Based on the above-stated findings, the ends of justice served by continuing the  
11 case as requested outweigh the interest of the public and the defendant in a trial within the  
12 original date prescribed by the Speedy Trial Act.

13 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
14 et seq., within which trial must commence, the time period of February 27, 2023 to April 10,  
15 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
16 T4] because it results from a continuance granted by the Court at the defendant's request on the  
17 basis of the Court's finding that the ends of justice served by taking such action outweigh the  
18 best interest of the public and the defendant in a speedy trial.

19 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
20 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
21 must commence.

22 IT IS SO STIPULATED.

23  
24 Dated: February 27, 2023

PHILLIP A. TALBERT  
United States Attorney

25  
26 /s/ ROSANNE L. RUST  
ROSANNE L. RUST  
27 Assistant United States Attorney

28  
Dated: February 27, 2023

/s/ ERIC HINTZ

ERIC HINTZ  
Counsel for Defendant  
BRENDA VILLA

**ORDER**

IT IS SO FOUND AND ORDERED.

Dated: February 28, 2023



WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE